

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Kristopher M. Hansen (*admitted pro hac vice*)
Ryan P. Montefusco (*admitted pro hac vice*)

PAUL HASTINGS LLP
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Matthew M. Murphy (*admitted pro hac vice*)
Matthew Micheli (*admitted pro hac vice*)

COLE SCHOTZ P.C.
Court Plaza North
25 Main Street
P.O. Box 800
Hackensack, New Jersey 07602-0800
Michael D. Sirota
Warren A. Usatine
Seth Van Aalten (*admitted pro hac vice*)
Justin Alberto (*admitted pro hac vice*)

PARKINS & RUBIO LLP
700 Milam, Suite 1300
Houston, Texas 77002
Lenard M. Parkins (*admitted pro hac vice*)
Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting
Counsel*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”), by and through its counsel, having filed substantially contemporaneously with this Application the *Ad Hoc Committee of Supporting Counsel’s Motion to Supplement the Record on Appeal* (the “Motion”), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “Scheduling Order”), for the reasons set forth below:

1. **For the reasons set forth below, the AHC of Supporting Counsel respectfully requests that the hearing on the Motion be scheduled for November 15, 2023 at 11:15 a.m., or as soon thereafter as the Court’s calendar permits.**

2. As set forth in the Motion, the AHC of Supporting Counsel seeks to supplement the record on appeal to include the Additional Documents² in connection with the AHC of Supporting Counsel’s appeal (the “Appeal”) from the Bankruptcy Court’s *Memorandum Opinion* [Docket No. 1127] (the “Dismissal Opinion”) and the related *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures with Respect to Requests for Compensation; and (III) Granting Related Relief* [Docket No. 1211] (the “Dismissal Order” and, together with the Dismissal Opinion, the “Opinion and Order”). The Appeal is pending before the United States Court of Appeals for the Third Circuit.

3. The TCC has challenged the AHC of Supporting Counsel’s standing in the Appeal, and the Additional Documents are material and relevant to that issue. The reduction of time requested in this Application will enable the AHC of Supporting Counsel to meet any briefing deadlines imposed in the Appeal.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

4. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

Dated: October 27, 2023

COLE SCHOTZ P.C.

/s/ Michael D. Sirota

Michael D. Sirota (NJ Bar No. 014321986)
Warren A. Usatine (NJ Bar No. 025881995)
Seth Van Aalten (admitted *pro hac vice*)
Justin Alberto (admitted *pro hac vice*)
Court Plaza North, 25 Main Street
Hackensack, NJ 07602-0800
Telephone: (201) 489-3000
Email: msirota@coleschotz.com
wusatine@coleschotz.com
svanaalten@coleschotz.com
jalberto@coleschotz.com

– and –

PAUL HASTINGS LLP

Kristopher M. Hansen (admitted *pro hac vice*)
Ryan P. Montefusco (admitted *pro hac vice*)
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Email: krishansen@paulhastings.com
ryanmontefusco@paulhastings.com

Matthew M. Murphy (admitted *pro hac vice*)
Matthew Micheli (admitted *pro hac vice*)
71 South Wacker Drive, Suite 4500
Chicago, IL 60606
Telephone: (312) 499-6000
Email: mattmurphy@paulhastings.com
mattmicheli@paulhastings.com

– and –

PARKINS & RUBIO LLP

Lenard M. Parkins (admitted *pro hac vice*)

Charles M. Rubio (admitted *pro hac vice*)
700 Milam, Suite 1300
Houston, TX 77002
Telephone: (713) 715-1660
Email: lparkins@parkinsrubio.com
crubio@parkinsrubio.com

*Counsel to Ad Hoc Committee
of Supporting Counsel*